

In the United States District Court
For The Middle District of Alabama
Northern Division

RECEIVED

Jenerral Reed Ambrose
#212801

2007 APR 11 A 9:16

Plaintiff.

U.S. DISTRICT COURT
MIDDLE DISTRICT ALA.

Civil Action;

2:06-CV-929-MHT

V.

Russell Thomas, et al,
Defendants.

Special Report of Plaintiff

Comes now the Plaintiff, in the above styled Civil Action, and wishes to show this Honorable Court, a Pattern of Negligence, Practiced by the defendants,

- 1) Upon review of the Jail Log Records, the Plaintiff finds many incomplete Jail Log Records.
- 2) The Following Jail Log sheets are not signed by the officer or officers, on duty, and shift
09-06-06, and shift 09-07-06, and shift 09-15-06
1st shift 09-22-06 and shift 09-22-06 and
2nd shift 09-28-06.
- 3) Fore the First shift of the morning of 09-25-06 the Jail Log Sheet seems to be missing.

- 4.) Fore the Second Shift of 10-10-06 the Jail Log Sheet Seems to be missing.
- 5.) Jail Log Sheet For the 3rd Shift of 09-27-06 states that at 6:18 AM the morning of 09-28-06 an inmate was found hanging from the bars.
- 6.) The last time entered by Jailer Prior to the finding the body was 3:17 AM
- 7.) Where was Jailer For three hours that he/she could not make their rounds?
- 8.) All medication is listed on Jail Log Records and not on Medical Records Report.
- 9.) Many Courts have held that medical examination on intake, at least for the Purpose of identifying Persons with Communicable diseases, are required. Tillery v. Owens 719 F Supp 1256, 1306.. 907, F 2d 418 (3d Cir 1990) Palmigiano v. Garrahy 639 F. Supp. 244, 253, (Condemning Lack of Tuberculosis testing.)

- 10.) The Keeping of Medical Records is a necessity. Adequate and accurate records are of critical importance in any attempt to provide a continuity of medical care, and deficient records create the possibility for disaster. Numerous courts have condemned the failure to maintain a reasonably complete and organized system of medical records.
- 11.) All medication is listed on Inmate Personal Jail Stationary, and not on Medical Records which would be provided by the Medical Provider.
- 12.) The following dates are incomplete Jail Records with failure to write times of appointed rounds on Jail log sheet. Jail Records are incomplete. and 9-8-06, and 9-15-06, and 9-17-06, 3rd 9-30-06 3rd 10-3-06, and 10-4-06, and 10-5-06, 3rd 10-6-06 1st 10-7-06, 2nd 10-7-06, 3rd 10-7-06, 2nd 10-8-06 3rd 10-10-06, 3rd 10-11-06, and 10-12-06, and 10-13-06 1st 10-14-06, and 10-15-06, 1st 10-16-06.
- 13.) Defendants were not only deliberately indifferent to the Plaintiffs Medical Needs, Defendants are also indifferent to their duties, and all those they have been entrusted to care for.

14.) The Jail Log entered on behalf of the defendants should show that the defendants are infact, indifferent to Preforming their duties. And, that the defendants did infact violate the Plaintiffs 8th Amendment Right in the way of deliberent indifference to Plaintiffs Serious Medical Needs, and Plaintiffs right of due Process as set forth in the 14th Amendment of the Constitution of The United States. Therefore, Plaintiff is entitled to relief.

General R. Amrose
Plaintiff

Sworn To And Subscribed before me
This The 9th day of April, 2007.

Perry O. Woods
Notary Public

I Hearby certify That a True and Correct Copy of The foregoing document has been Furnished and Sent to The Counsel for the defendants, whos Names are, Sheriff Russell Thomas, Captain Doug Wheeler and Olivia Pearson Head Jailer (Administrator), whos address is 120 Church Street, Troy Alabama, 36081.

General R. Ambrose
Plaintiff

Sworn To and Subscribed before me
This The 9th day of April, 2007.

Penny O. Woods
Notary Public

General Reed Ambrose #212801
Kilby Prison
P.O. Box 150
Mt. Meigs 36057



Office of The Clerk.
United States District Court
Middle District of Alabama
P.O. Box 711
Montgomery, AL 36101-0711

LEGAL MAIL

This correspondence is forwarded from an Alabama State Prison. The contents have not been evaluated, and the Alabama Department of Corrections is not responsible for the substance or content of the enclosed communication.

IN The United States District Court
For The Middle District of Alabama
Northern Division

General Reed Ambrose
#212801

Plaintiff

vs.

Russell Thomas, et, al.

Defendants.

Civil Action

2:06 - CV - 929 MHT

Witness

Affidavit of Robert M. Young III AIS. 123730

My name is Robert M. Young III, I am a witness for the plaintiff in the above style civil action. I was recently a prisoner at the Pike Co. Jail in Troy, AL. They have no nurse or doctor at the Pike Co. Jail to see the prisoner's needs. They have no sick call procedure at all. They have no blood test for H.I.V. or Hepatitis and do no T.B. skin test. Inmates are put straight in to population. Trustees pass out the medication to prisoners. The Jailers make no rounds to check on prisoners at all. The Jail has paint peeling from the ceiling & walls. Very dim lighting, roaches everywhere. They have no balanced meals at all, no special meals for those who require a special diet.

I Hearby Certify that a true and correct copy of the foregoing document has been furnished to the counsel for the defendants whos names are Russell Thomas, Doug Wheeler and Olivia Pearson whos address is 120 Church street Troy, Alabama,, 36091.

Robert M. Young III

SWORN AND Subscribed before me on this the
25 DAY OF MARCH 2000 .

Curtis L. Brown
NOTARY

IN The United States District Court
For The middle district of Alabama
Northern Division

Jenernal Reed Ambrose

#212801

Plaintiff

v

Russell Thomas, et.al.

Defendants.

2007 APR 11

Civil Action
2:06-CV-929 MHT

U.S. DISTRICT COURT
MIDDLE DISTRICT ALA.

Witness

Affidavit of Wayne A. Caple #165321

My name is Wayne A. Caple; I am a witness for the plaintiff in the above civil action suit. I was recently housed at the Pike Co. Jail; I am a witness to the lack of medical treatment at the Pike Co. Jail for inmates. They have no nurse, doctor or any other medical provider at the Pike Co. Jail at no time. I am a insulin dependant diabetic and being a diabetic it is important that I check my blood sugar before injecting insulin. Pike Co. Jail would not provide me with a monitor to check my blood sugar; they relied on trustee inmates to pass out all medications. I was not giving a special diet that was required, I ate what every other inmate ate. They do not take blood from inmates that enter the jail to test for HIV, Hepatitis or T.B. skin test. Inmates are placed in population regardless of any contagious diseases they may have. The conditions of the jail are very poor. Paint peeling of the wall, dim lightings, roaches everywhere. Jailors do not make their required rounds within their

8 hour shifts. About a week ago, I notified the jail administrator that I wasn't feeling well & that I needed medical assistance, I was told that they would get back to me. An hour later I was told to pack up my possessions & that I was being transferred to a state prison facility.

I Hearby Certify that a true and correct copy of the foregoing document has been Furnished to the Counsel Fore the defendants who's Names are Russell Thomas, Doug Wheeler, Olivia Pearson,, who's address is 120 Church street, Troy Alabama, 36081.

Dagmar Cople

Sworn To and subscribed before me
This the ~~22nd~~ day of March 2007

Guthrie M. Butler

Notary Republic

IN The United States District Court For
The middle District of Alabama
Northern Division

Jenerral Reed Ambrose
#212801

Plaintiff,

VS.

Russell Thomas, et al.,

Defendants.

RECEIVED
2007 APR 11 A 9:18

U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

Civil Action
2:06-CV-929 MHT

AFFIDAVIT of Jenerral Reed Ambrose #212801.

- 1) The defendants are aware of all complaints Filed by Plaintiff, as Plaintiff mailed Copies to defendants, and Counsel fore defendants.
- 2) on or around September 9th the Plaintiff Contracted an ear infection in his left ear.
- 3) Plaintiffs ear was swollen shut, and clear and Yellowish discharge was draining from Plaintiffs ear.
- 4) Plaintiff made known to Olivia Pearson, the Jail administrator repetely about his need to see a doctor.
- 5) Ms. Pearson refused the Plaintiff medical treatment and told the Plaintiff, "You'll be alright".
- 6) Plaintiff Suffered a great deal of pain for several days.
- 7) Plaintiff was informed Pike County Jail had no nurse or doctor.

- 8.) Plaintiff ask to be taken to see a doctor, and to cover cost of doctor's visit, but was still refused.
- 9.) When the Plaintiff was at the Pike County Jail they had no Medical Provider at all.
- 10.) Pike County has no Medical Sick Call Procedure at all to treat inmates.
- 11.) Pike County has no Medical intake Procedure to give T.B. Skin test, and list any medication that the inmate may be taking.
- 12.) T.B. Skin testing is mandatory for state and county facilities to stop the spread of contagious diseases.
- 13.) Psychological evaluation should be done on inmates to see if they are taking any special medication, and if the inmate is stable enough to be placed in general population, or if inmate needs 24 hour supervision in isolation cell with video monitoring. This is to keep the inmate from harming him or herself or others.
- 14.) Pike County has no Medical Provider to pass out prescribed medication.
- 15.) Inmates medication is listed on Jails Prisoner check list with the times of Jailers rounds, and not on Medical Records Report which would be furnished by Medical Provider.

16.) The Keeping of Medical Records is a necessity.

Adequate and accurate records are critical importance in any attempt to provide a continuity of Medical Care, and absent or deficient records create the possibility for disaster. Numerous courts have condemned the failure to maintain a reasonably complete and organized system of medical records.

17.) Many courts have held that medical examination on intake, at least for the purpose of identifying persons with communicable diseases, are required.

18.) Plaintiff was placed in cell where random acts of violence took place with no supervision to deter such acts.

19.) Cells at Pike County Jail are very nasty with paint peeling from walls and ceiling and roaches everywhere. Cells are very dim with low lighting.

20.) Captain Doug Wheeler is captain at Pike County Jail, and it is his duty to investigate and report to the sheriff, Russell Thomas, who then makes the final decision if inmate require any outside medical treatment.

- 21.) By failing to follow their own standard operational Procedure, the defendants violation of the 14th Amendant, in regards to the Plaintiff right of due Process, was violated.
- 22.) Due to the crule conditions of the pike County Jail, along with the pain he suffered, Created a Psychological Condition of Post traumatic Stress disorder, which Plaintiff suffers from.
- 23.) The Prisoner Litigation Reform Act was designed to stop the Filing of frivolous Law suits with no merit in order to do nothing but back up the court System for Malious intent.
- 24.) Plaintiffs Civil Action is based on actual facts of Constitutional violations which take place at the Pike County Jail on a daily basis.
- 25.) The defendants are only amune from an 42 U.S.C. § 1983 in their ~~offical~~ capacity under the 11th Amendment, but not in their individual Capacity.
- 26.) Plaintiff is entitled to relief for the violations of Plaintiffs 8th and 14th Amendment Rights to the Constitution of the Unites States.

- 27.) Plaintiff wishes that his complaint in the form of an 42 U.S.C. § 1983 will force the Pike County Jail Administration to furnish a medical provider to better care for the inmates currently at the Pike County Jail, and those who will be there in the future.
- 28.) Defendants, Captain Doug Wheeler and Sheriff Russell Thomas, having knowledge of constitutional violations, and doing nothing to stop the said violations, make them a willing participant in the said violation. As well as Jail Administrator Olivia Pearson.

General R Ombrose
Plaintiff

Sworn To and Subscribed before me

This The 9th day of April 2007.

I Hearby Certify That a True and Correct Copy
of The Foregoing Document, Has been Furnished
To The Counsel For The Defendants,, whos Names
are Russell Thomas, Doug wheeler and
Olivia Pearson. Whos address is 120 Church Street,
Troy, Alabama, 36081.

General R Ambrose
Plaintiff.

Sworn To and Subscribed before me
This the 9th day of April, 2007.

Penny A. Woods
Notary Public